



**EARTHJUSTICE**

*Because the earth needs a good lawyer*

BOZEMAN, MONTANA DENVER, COLORADO HONOLULU, HAWAII  
INTERNATIONAL JUNEAU, ALASKA OAKLAND, CALIFORNIA  
SEATTLE, WASHINGTON TALLAHASSEE, FLORIDA WASHINGTON, D.C.  
ENVIRONMENTAL LAW CLINIC AT STANFORD UNIVERSITY

August 19, 2004

By U.S. Mail and email

Gary Oliva  
Estate of James Campbell  
James Campbell Bldg.  
1001 Kamokila Blvd., Fl. 2  
Kapolei, Hawai'i 96707  
e: garyo@campbellestate.com

Re: 'Ilio'ulaokalani Coalition, et al., v. Donald H. Rumsfeld, et al., Civ. No. 04-00502  
ACK BMK (D. Haw.)

Dear Mr. Oliva,

This morning, the U.S. Attorney's Office informed us that the U.S. Army has accepted Campbell Estate's offer to sell approximately 1,400 acres adjacent to Schofield Barracks, a land acquisition associated with the Army's planned transformation of the 2<sup>nd</sup> Brigade, 25<sup>th</sup> Infantry Division (Light), to a Stryker Brigade in Hawai'i. We hereby notify Campbell Estate that, on August 17, 2004, Earthjustice filed suit on behalf of three Native Hawaiian organizations to challenge the Army's failure to comply with the National Environmental Policy Act (NEPA) in connection with its decision to proceed with the 2<sup>nd</sup> Brigade's transformation. Among other things, our lawsuit seeks an order from the federal district court enjoining the Army from carrying out any activity associated with the proposed transformation in Hawai'i of the 2<sup>nd</sup> Brigade, including, but not limited to, acquisition of the aforementioned 1,400 acres, at least for the duration of the Army's noncompliance with NEPA.

I have attached a copy of the complaint for your review. I would appreciate it if you would contact me to discuss this matter.

Sincerely,

David Lane Henkin

DLH/tt  
Enclosure

**EXHIBIT 18**